

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA
(PITTSBURGH)

AND NOW, THIS 19th DAY OF
Feb 13, IT IS HEREBY
ORDERED THAT THE WITHIN
MOTION IS DENIED..

JEROME BROWN
PETITIONER,

V.

UNITED STATES OF AMERICA
RESPONDENT,

CASE NO. 08-98

Gary L. Lancaster
GARY L. LANCASTER,
UNITED STATES DISTRICT JUDGE

THE HONORABLE GARY L. LANCASTER
CHIEF U.S. DISTRICT COURT JUDGE

MOTION FOR RECONSIDERATION AND FOR
A FULL EVIDENTIARY HEARING

COMES NOW, PETITIONER, JEROME BROWN, PROSE ACTING ON HIS OWN BEHALF, MOVING AND PETITIONING THIS HONORABLE COURT IN ACCORDANCE WITH RULES OF CIVIL PROCEDURE; RULE 59(e), REQUESTING THIS HONORABLE COURT TO GRANT PETITIONER'S MOTION FOR RECONSIDERATION ON ORDER OF DENIAL BY THIS HONORABLE COURT AS WELL AS A FULL EVIDENTIARY HEARING IN THE ABOVE STYLED CASE, FOR AS FOLLOWS:

PRO-SE FILING:

PETITIONER WOULD LIKE TO REMIND THIS HONORABLE COURT AT THIS TIME THAT HE IS AN "UNTRAINED ATTORNEY" AND IS PROCEEDING "PRO-SE" AND RESPECTFULLY REQUEST THIS HONORABLE COURT TO AFFORD HIM THE PROTECTIONS THEREIN HAINES V. KERNER, 404 U.S. 519-520; 92 S. CT. 594 (1972).

FACTUAL AND PROCEDURAL BACKGROUND:

- 1). PETITIONER WOULD BE ABLE TO OFFER PROOF THAT HIS ATTORNEY FOR TRIAL, APPEAL COUNSEL, AND THE PAID ATTORNEY DID NOT HAVE HIS BEST INTEREST AT HEART.
- 2). STARTING WITH THE TRIAL ATTORNEY, MR HACKNEY, ESQ. WAS SO INEFFECTIVE THAT YOUR HONOR TOLD HIM TO "SIT DOWN" DURING A CROSS-EXAMINATION AT THE FIRST EVIDENTIARY HEARING. REASON BEING, HE WAS NOT ASKING ANY RELEVANT QUESTIONS.
- 3). DEFENSE COUNSEL ALLOWED THE GOVERNMENT TO PLAY A RECORDED PHONE CONVERSATION TO THE JURY WITHOUT ANY EVIDENCE THAT I WAS THE SPEAKER DURING THAT CONVERSATION.
- 4). THE CONFIDENTIAL AGREEMENT FORM SUBMITTED INTO EVIDENCE WAS FORGED. MR. HACKNEY NEVER REALIZED THAT IT WAS SIGNED FIVE (5) MONTHS AFTER ALLEGED TRANSACTION. AGENT HENSELL TESTIFIED THAT IT WAS SIGNED BEFORE THE ALLEGED TRANSACTION, WHICH WOULD OF PROVED THAT HIS TESTIMONY WAS FALSE.